

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

**ALEJANDRA SOTA MIRAFUENTES,**

**Plaintiff,**

**v.**

**DOLIA ESTEVEZ,**

**Defendant.**

Case No. 1:15-cv-00610 (LO/JFA)

**MOTION OF DEFENDANT DOLIA ESTEVEZ TO DISMISS THE  
CORRECTED AMENDED COMPLAINT**

Defendant Dolia Estevez, by counsel, hereby moves this Court to dismiss the corrected amended complaint filed by Plaintiff Alejandra Sota Mirafuentes, pursuant to Federal Rule of Procedure 12(b)(6), for the reasons stated in the accompanying memorandum of points and authorities in support of the motion, filed contemporaneously herewith.

**GOOD FAITH CERTIFICATION PURSUANT TO LOCAL RULE 7(E)**

Counsel hereby represents that the parties made a good faith effort to resolve this matter pursuant to Local Civil Rule 7(E), but were unable to come to a resolution, resulting in the need to file this motion to dismiss.

Respectfully submitted,

Dated: October 13, 2015

By: /s/ John A. Trocki III  
John A. Trocki III (Va. Bar No. 38656)  
MORRISON & FOERSTER LLP  
1650 Tysons Boulevard, Suite 400  
McLean, VA 22102  
Telephone: (703) 760-7712  
Facsimile: (703) 760-7777  
JTrocki@mofo.com

and

Ronald G. White (admitted *pro hac vice*)  
Kayvan B. Sadeghi (admitted *pro hac vice*)  
MORRISON & FOERSTER LLP  
250 West 55<sup>th</sup> Street  
New York, New York 10019  
Telephone: (212) 468-8000  
Facsimile: (212) 468-7900  
RWhite@mofo.com  
KSadeghi@mofo.com

*Attorneys for Defendant Dolia Estevez*

Of Counsel:

Charles J. Glasser, Jr.  
Charles Glasser LLC  
53 Valley Way  
West Orange, NJ 07052  
(973) 666-6270

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing was delivered by electronic filing and also by email, as indicated, on this 13th of October, 2015.

Richard Scott Meyer, Esq.  
Jonathan Sherman, Esq.  
**Boies Schiller & Flexner LLP**  
5301 Wisconsin Ave NW  
Suite 5700  
Washington, DC 20015-2015  
202-274-1130  
Fax: 202-237-6131  
Email: [rmeyer@bsfllp.com](mailto:rmeyer@bsfllp.com)  
[jsherman@bsfllp.com](mailto:jsherman@bsfllp.com)

John F. Cove, Jr.  
Beko O. Reblitz-Richardson  
**Boies Schiller & Flexner LLP**  
1999 Harrison Street  
Suite 900  
Oakland, CA 94612  
[jcove@bsfllp.com](mailto:jcove@bsfllp.com)  
[brichardson@bsfllp.com](mailto:brichardson@bsfllp.com)

*Counsel for Plaintiff*

By: /s/ John A. Trocki III  
John A. Trocki III (Va. Bar No. 38656)  
MORRISON & FOERSTER LLP  
1650 Tysons Boulevard, Suite 400  
McLean, VA 22102  
Telephone: (703) 760-7712  
Facsimile: (703) 760-7777  
JTrocki@mofo.com